

EXHIBIT I

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MATTHEW SCOTT, et al.,

Plaintiffs,

v.

TRUSTIFY, INC., et al.,

Defendants.

Civ. Action No. 1:19-cv-00032 (LO/MSN)

SWORN DECLARATION OF JACK JARRETT

Pursuant to 28 U.S.C. 1746, I, Jack Jarrett, declare under penalty of perjury that the following is true and correct:

1. I received my undergraduate degree from Virginia Tech in 2010 and my law degree from George Mason University School of Law in 2013.
2. I was admitted to the Virginia Bar in October 2013. I am also licensed to practice in the U.S. District Courts for the Eastern and Western Districts of Virginia, the Court of Federal Claims, and the U.S. Court of Appeals for the Fourth and Federal Circuits.
3. I have worked as an attorney in private practice since January 2014, focusing on representing clients in employment matters.
4. My current standard hourly billing rate is \$358.00.
5. Over the course of my career, I have represented hundreds of clients in a variety of employment matters.
6. The work I performed work for Plaintiffs' case was contemporaneously recorded and the following tasks were performed:

12/4/2018	Researched personal liability and composed email to clients re necessary information	J.J.	1.30
12/5/2018	Exchanged emails w clients and reviewed information submitted; researched permissibility of contacting for chief of staff	J.J.	1.00
12/6/2018	Updated matter and efile to show M.Scott addition	S.V.	.20
12/11/2018	Exchanged emails w colleague re case and reviewed research	J.J.	.30
12/16/2018	Began drafting complaint	J.J.	1.80
12/17/2018	Continued drafting complaint and composed email to clients re same	J.J.	1.90
12/18/2018	Finished drafting complaint and sent to clients for review	J.J.	2.30
12/20/2018	Reviewed updates and began incorporating same	J.J.	.40
1/2/2019	Exchanged emails w clients and updated complaint	J.J.	.70
1/4/2019	Updated complaint based on additional info and submitted to clients	J.J.	.50
1/7/2019	Composed email to clients re case	J.J.	.10
1/8/2019	Finalized and filed complaint; cover sheet; and summonses	J.J.	1.20
1/22/2019	Downloaded complaint and forwarded for service	J.J.	.20
1/23/2019	Composed email updating clients	J.J.	.10
1/30/2019	Call from OC re case and potential settlement; began reviewing damages claims; exchanged emails w OC	J.J.	.90
2/1/2019	Composed email to clients; reviewed responses and calculated damages	J.J.	2.50
2/4/2019	Exchanged email w OC re company property	J.J.	.10
2/4/2019	Exchanged email w OC re factual claims	J.J.	.20
2/4/2019	Calculated damages for each plaintiff and composed emails re same to each for settlement offer	J.J.	2.60
2/5/2019	Exchanged emails w clients re settlement and composed settlement offer to OC	J.J.	.50
2/5/2019	Exchanged emails w clients re return of company property	J.J.	.20
2/5/2019	Exchanged follow up emails re return of company property	J.J.	.30
2/5/2019	Forwarded demand and offer to managing shareholder; discussed same	J.J.	.50
2/7/2019	Exchanged emails w clients and OC re return of laptops	J.J.	.40
2/7/2019	Met w client and received company property	J.J.	.30
2/7/2019	Calculated damages without liquidated and composed emails to clients re same	J.J.	.80
2/8/2019	Exchanged emails w and met w clients re return of company property	J.J.	.80
2/8/2019	Composed email to OC re settlement offer	J.J.	.30
2/11/2019	Collected and stored computer from client	J.J.	.20
2/13/2019	Exchanged email w clients re status	J.J.	.10
2/15/2019	Reviewed materials and exchanged emails w OC	J.J.	.40
2/18/2019	Exchanged email w clients re case	J.J.	.10
2/19/2019	Met w opposing party to return laptops	J.J.	.50

2/20/2019	Reviewed settlement offer and exchanged emails w OC re same	J.J.	.80
2/20/2019	Composed email to clients re settlement	J.J.	.40
2/28/2019	Drafted and sent emails to clients re settlement	J.J.	.80
3/1/2019	Exchanged email w OC	J.J.	.20
3/1/2019	Calculated fees and exchanged emails w clients	J.J.	2.10
3/6/2019	Composed email to Blanchard	J.J.	.20
3/6/2019	Email to process server re status	J.J.	.10
3/6/2019	Composed email w settlement demand to OC; email to clients re same	J.J.	.30
3/12/2019	Email to client re status	J.J.	.10
3/20/2019	Exchanged emails w OC	J.J.	.10
3/21/2019	Email to OC; scanned in affidavits of service; email to clients re settlement offer	J.J.	.50
3/22/2019	Emails and call re settlement total	J.J.	.60
3/23/2019	Updated damages figures and emails to clients re same	J.J.	1.00
3/25/2019	Email to client re potential settlement	J.J.	.20
3/25/2019	Emails and call w OC re settlement	J.J.	.20
3/26/2019	Email to OC	J.J.	.10
3/28/2019	Reviewed email and blog post from defendant re bankruptcy; reviewed case filed to appoint receiver	J.J.	1.20
4/1/2019	Email to clients re status	J.J.	.10
4/1/2019	Reviewed email from OC re company insolvency and exchanged emails and texts w colleague re samples and next steps	J.J.	.50
4/2/2019	Email to clients re status; researched entry of default against individuals and filed motion for same	J.J.	2.80
4/3/2019	Email to clients re potential other plaintiffs	J.J.	.20
4/10/2019	Began drafting motion for default judgment	J.J.	2.30
4/12/2019	Email to Trustify clients; continued researching and working on motion for default	J.J.	2.70
5/2/2019	Drafted affidavits for memos and sent to clients	J.J.	1.60
5/3/2019	Email to Ms. Nugent re affidavit	J.J.	.10
5/7/2019	Updated and sent affidavit to Ms. Blackburn	J.J.	.20
5/7/2019	Email to clients re affidavits	J.J.	.10
5/8/2019	Emails to Trustify clients re missing docs	J.J.	.30
5/8/2019	Email to administrative assistants re info needed from clients	J.J.	.10
5/9/2019	Emails to clients re offer letters	J.J.	.10
5/9/2019	Continued drafting motion for default memo	J.J.	2.70
5/12/2019	Continued working on motion for default	J.J.	1.00
TOTAL:			48.00

7. The total costs incurred amount to \$626.00 (\$400.00 filing fee and \$236.00 for service of

process on Defendants).

I declare under penalty of perjury that the foregoing is true and correct.

Executed by:



Jack Jarrett

On:

5/23/2019

Date